

### **Remarks**

In view of the above amendments and the following remarks, reconsideration of the rejection and further examination are requested.

The specification and abstract have been reviewed and revised to make a number of editorial revisions thereto. Due to the number of changes involved, a substitute specification and abstract have been prepared and are submitted herewith. No new matter has been added. Also submitted herewith are marked-up copies of the substitute specification and abstract.

Claims 1-6 have been rejected under 35 U.S.C. §102(b) as being anticipated by Akerib (US 5,974,521).

Claims 1 and 2 have been canceled without prejudice or disclaimer to the subject matter contained therein. Further, claims 3-6 have been amended.

It is submitted that the above-mentioned rejection is no longer applicable to the amended claims for the following reasons.

Claim 3 is patentable over Akerib, since claim 3 recites an image processor including, in part, a first storage unit operable to store separated image data formed by several pieces of pixel data, the separated image data having a predetermined width and being separated from lines of image data; a filtering unit operable to filter target pixel data subject to filtering using predetermined pieces of the pixel data, thereby outputting filtered pixel data and non-filtered pixel data; a setting unit operable to setting a mode signal indicating whether or not the non-filtered pixel data is to be fed; and a data output control unit operable to control feeding of the non-filtered pixel data according to the mode signal, wherein the first storage unit has a same width as the predetermined width. Akerib fails to disclose or suggest these features of claim 3.

Akerib discloses a signal processing apparatus including a simultaneously accessible FIFO 10, a processor element array 16, a data link 30, and a controller 40. The processor element array 16 includes a plurality of processor elements (PE) 20 that are controlled by the controller 40. The FIFO 10 receives and stores at least a portion of an incoming signal (e.g., an image) and feeds subportions of the signal to the PEs 20 in the processor element array 16. Each PE 20 processes the respective subportion of the image and includes at least one associative memory cell for storing the subportion of the image. The PEs 20 then output the processed subportions to the data link 30. (See column 13, line 55 – column 15, line 49 and Figure. 1).

In the rejection, it appears that the memory cells associated with the PEs 20 in Akerib are being relied upon as corresponding to the claimed first storage unit. However, while the memory cells are disclosed as storing subportions of the image, there is no disclosure or suggestion in Akerib that the subportions are separated from lines of image data. Also, there is no indication that the memory cells of the PEs 20 have a same width as the subportions. As a result, the memory cells of Akerib do not correspond to the claimed first storage unit.

The rejection also relies on the general discussion in Akerib of the use of filters at column 35, lines 42-54 as disclosing the claimed filtering unit. However, the claimed filtering unit is operable to filter target pixel data subject to filtering using predetermined pieces of pixel data, thereby outputting filtered pixel data and non-filtered pixel data. In other words, the claimed filtering unit performs targeted filtering. It is apparent that the general mention of filtering in Akerib does not disclose or suggest the specifics of the claimed filtering unit. As a result, Akerib fails to disclose or suggest the claimed filtering unit.

Further, claim 3 now recites the setting unit that is operable to set a mode signal indicating whether or not the non-filtered pixel data is to be fed. In the rejection of claim 4, column 2, lines 35-45 of Akerib is relied upon as disclosing a determination as to whether or not non-filtered image data is to be fed. However, after reviewing this section of Akerib, it is apparent that the only disclosure contained in this portion of Akerib is a list of titles of references. There is absolutely no mention in this section of Akerib, or any other section for that matter, of setting a mode signal associated with the feeding of non-filtered pixel data. Therefore, it is apparent Akerib also fails to disclose or suggest the claimed setting unit.

Additionally, while Akerib does disclose the controller 40 which is used to control the operation of the PE's 20, it is apparent that there is no disclosure or suggestion in Akerib that the control unit 40 performs any control of whether or not non-filtered pixel data is fed in accordance with a mode signal. Therefore, it is apparent that Akerib also fails to disclose or suggest this feature of claim 3. As a result, it is apparent that Akerib fails to disclose or suggest the first storage unit, filtering unit, setting unit, and data output control unit as recited in claim 3.

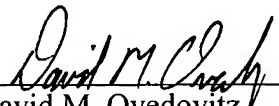
Because of the above-mentioned distinctions, it is believed clear that claims 3-6 are not anticipated by Akerib. Furthermore, it is submitted that the distinctions are such that a person having ordinary skill in the art at the time of invention would not have been motivated to modify Akerib or to make any combination of the references of record in such a manner as to result in,

or otherwise render obvious, the present invention as recited in claims 3-6. Therefore, it is submitted that claims 3-6 are clearly allowable over the prior art of record.

In view of the above amendments and remarks, it is submitted that the present application is now in condition for allowance. The Examiner is invited to contact the undersigned by telephone if it is felt that there are issues remaining which must be resolved before allowance of the application.

Respectfully submitted,

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